

SECTION 1 – PROGRAM GOVERNANCE AND SCOPE

1.1 Purpose

This Programmatic Policies and Operations Manual establishes the governance framework, authority structure, oversight standards, and programmatic service delivery requirements for workforce programs administered under the jurisdiction of the New River/Mount Rogers Workforce Development Board.

This Manual establishes uniform standards governing:

- Program eligibility and enrollment
- Case management and service delivery
- Training and work-based learning activities
- Supportive services and participant financial assistance
- Program performance accountability
- Data integrity and reporting
- Program monitoring and oversight

This Manual applies to all workforce programs operated by or under the authority of the Workforce Development Board regardless of funding source, unless a specific funding agreement imposes stricter requirements.

Where federal or state law establishes more stringent requirements, the stricter requirement shall apply.

1.2 Legal Authority and Governance Structure

The New River/Mount Rogers Workforce Development Area Consortium Board serves as the Chief Local Elected Officials (CLEO) entity and the legal grant recipient for the local workforce development area pursuant to the Workforce Innovation and Opportunity Act (WIOA).

The New River/Mount Rogers Workforce Development Board is appointed in accordance with WIOA and is responsible for establishing workforce development policy and providing oversight of workforce programs operating within the local workforce development area.

In accordance with WIOA and applicable federal and state regulations, the Workforce Development Board is responsible for:

- Establishing local workforce development policy
- Overseeing the One-Stop delivery system
- Ensuring program performance accountability
- Ensuring fiscal integrity and internal control systems
- Selecting and overseeing the One-Stop Operator
- Monitoring service providers and subrecipients
- Ensuring compliance with federal and state law

This Manual constitutes official programmatic policy adopted and enforced by the Workforce Development Board.

1.3 Applicability

This Manual applies to all workforce development programs administered or overseen by the Workforce Development Board, including but not limited to:

- WIOA Title I Adult Program
- WIOA Title I Dislocated Worker Program
- WIOA Title I Youth Program
- YouthBuild
- State-funded workforce initiatives
- Appalachian Regional Commission workforce initiatives
- Federal discretionary workforce grants
- Competitive grant-funded workforce programs
- Any workforce program operating under the authority of the Workforce Development Board

Subrecipients, contractors, service providers, and partners operating under Board authority must comply with this Manual unless otherwise specified in written agreements.

1.4 Relationship to Other Governing Documents

This Programmatic Policies and Operations Manual operates in coordination with the following governing documents:

- Governance and Legal Compliance Manual
- Financial Management and Procedures Manual

This Manual establishes programmatic service delivery standards.

All fiscal transactions, procurement activities, payroll processing, match documentation, cash management, and internal control requirements related to financial management are governed by the Financial Management and Procedures Manual.

In the event of conflict:

- Fiscal matters shall be governed by the Financial Management and Procedures Manual.
- Governance authority shall be governed by the Governance and Legal Compliance Manual.

1.5 Regulatory Framework

This Manual is developed in accordance with and shall be interpreted consistent with the following authorities:

- Workforce Innovation and Opportunity Act (WIOA)
- 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Applicable federal awarding agency regulations
- YouthBuild regulations where applicable
- Jobs for Veterans Act where applicable
- 29 CFR Part 38 – Nondiscrimination and Equal Opportunity
- Virginia Works policy guidance
- Applicable provisions of state law

Programs funded through discretionary or competitive awards must comply with all terms and conditions established in the applicable Notice of Award.

1.6 Internal Control Standards

All programmatic activities conducted under this Manual shall operate in accordance with internal control requirements established under 2 CFR §200.303.

Program staff shall:

- Ensure services are allowable and properly documented
- Maintain appropriate segregation of duties where applicable
- Ensure participant eligibility determinations are properly documented
- Ensure performance outcomes are supported by verifiable documentation
- Prevent retroactive enrollment practices
- Prevent unsupported or unauthorized participant payments
- Maintain documentation sufficient to support monitoring, audit, and performance verification

Failure to maintain required documentation may result in disallowed costs, performance disallowance, or corrective action.

1.7 One-Stop Delivery System Integration

The Workforce Development Board oversees the One-Stop delivery system within the local workforce development area.

Programs governed by this Manual shall:

- Coordinate with One-Stop partner programs
- Support integrated service delivery
- Encourage co-enrollment when appropriate
- Avoid duplication of services
- Align activities with regional workforce strategy

The One-Stop Operator performs coordination functions in accordance with applicable policy and procurement standards.

1.8 Equal Opportunity and Accessibility

All programs administered under this Manual shall operate in compliance with:

- WIOA Section 188
- 29 CFR Part 38
- Title VI of the Civil Rights Act
- Section 504 of the Rehabilitation Act
- Americans with Disabilities Act
- Age Discrimination Act
- Title IX

Programs shall:

- Provide equal opportunity in admission and participation
- Provide reasonable accommodations for individuals with disabilities
- Provide language assistance for individuals with limited English proficiency
- Maintain required nondiscrimination documentation

Failure to comply with equal opportunity requirements may result in corrective action or funding sanctions.

1.9 Subrecipient and Contractor Compliance

Subrecipients and contractors providing services under the authority of the Workforce Development Board shall:

- Operate in accordance with this Manual
- Maintain documentation sufficient to withstand monitoring and audit review
- Submit required reports in a timely manner
- Cooperate fully with monitoring and oversight activities

The Workforce Development Board reserves the right to impose corrective action for noncompliance in accordance with applicable federal, state, and local requirements.

1.10 Monitoring and Enforcement Authority

The Workforce Development Board, through its Executive Director and authorized staff, shall conduct oversight activities to ensure compliance with this Manual.

Oversight activities may include:

- Internal program reviews
- Monitoring of eligibility determinations
- Validation of performance documentation
- Participant file reviews
- Data integrity verification

Failure to comply with programmatic policies may result in:

- Technical assistance
- Corrective action plans
- Special grant conditions
- Funding modification
- Contract termination

1.11 Policy Review and Amendment

This Manual shall be reviewed periodically and updated as necessary to reflect:

- Federal regulatory changes
- Virginia Works guidance updates
- Grant-specific requirements
- Organizational restructuring

Interim updates may be issued when regulatory changes require immediate revision.

1.12 Supervisory Authority Clarification

For purposes of this Manual, supervisory review or approval shall mean review and approval by the **Program Manager or a formally designated designee assigned oversight responsibility**.

Delegation of supervisory authority must be documented in writing.